LIBRARY
SUPREME COURT, U. S.

Office-Supreme Court, U.S.
FILED
JUN 10 1966
JOHN F. DAVIS, CLERK

IN THE

Supreme Court of the United States

OCTOBER TERM, 1965

No. ~~1351~~ 219

WILLIE JACKSON, *Petitioner*

v.

UNITED STATES OF AMERICA

PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

HOWARD MOORE, JR.
859½ Hunter Street, N.W.
Atlanta, Georgia 30314

JOHN H. RUFFIN, JR.
930 Gwinnett Street
Augusta, Georgia

Attorneys for Petitioner

PRESS OF BYRON S. ADAMS PRINTING, INC., WASHINGTON, D. C.

INDEX

	Page
Opinions Below	1
Jurisdiction	2
Questions Presented	2
Constitutional and Statutory Provisions Involved	3
Statement	5
Reasons for Granting the Writ	10
Conclusion	15

Appendix:

Opinion of the Court of Appeals	1a
Judgment	3a
Order Denying Motion for Rehearing	4a

TABLE OF CITATIONS

CASES:

Adams v. United States, 336 U.S. F. 2d 752 (D.C. Cir., 1964) ..... 14 fn. 4, 15
Armada v. United States, 319 F. 2d 793 (5th Cir. 1963) ..... 15 fn. 4
Beck v. United States, 379 U.S. 89 (1964) 12
Brinegar v. United States, 338 U.S. 160 (1949) ..11, 14 fn. 4
Carroll v. United States, 267 U.S. 132 (1925) .....10, 11, 14 fn. 4
Draper v. United States, 358 U.S. 367 (1959) .....12 fn. 2
Elkins v. United States, 364 U.S. 206 (1906) 12, 13
Monroe v. Pape, 365 U.S. 167 (1961) .....12 fn. 1
Olmstead v. United States, 277 U.S. 438 (1928) 13
Pickett v. State, 99 Ga. 12 (1896) 11
Preston v. United States, 376 U.S. 364 (1964) ....11, 13, 14 fn. 4

Page

Rent v. United States, 209 F. 2d 893 (5th Cir. 1954) ..... 14 fn. 4
Rhodes v. United States, 224 F. 2d 348 (5th Cir. 1955) 10
Scher v. United States, 305 U.S. 251 (1938) 10
Sirimarco v. United States, 315 F. 2d 699 (10th Cir. 1963) ..... 14 fn. 4
Trupiano v. United States, 334 U.S. 699 (1948) ..... 14 fn. 4
United States v. Di Re, 332 U.S. 581 (1948) ..... 11, 14 fn. 4
United States v. Rabinowitz, 339 U.S. 56 (1950) ..... 14 fn. 4
United States v. Stoffey, 279 F. 2d 924 (7th Cir. 1960) ..... 14 fn. 4
Wong Sun v. United States, 371 U.S. 471 (1963) 15

CONSTITUTIONAL PROVISIONS:

Fourth Amendment of the Constitution of the United States 2, 3

Fourteenth Amendment of the Constitution of the United States 2, 3

STATUTES:

26 United States Code, Sections 5205(a)(2) and 5604 (a) 5

28 United States Code, Section 1254(1) 2

27 Georgia Code Annotated, Section 207 ..... 3, 5

68 Georgia Code Annotated, Section 1707 ..... 3, 10

68 Georgia Code Annotated, Section 1701(a) 3

92A Georgia Code Annotated, Section 422 ..... 4, 11

92A Georgia Code Annotated, Section 423 4

92A Georgia Code Annotated, Sectioin 427.1 ..... 4, 11

IN THE

Supreme Court of the United States

OCTOBER TERM, 1965

No.

WILLIE JACKSON, *Petitioner*

v.

UNITED STATES OF AMERICA

PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

Petitioner prays that a writ of certiorari issue to review the judgment of the United States Court of Appeals for the Fifth Circuit entered in the above-entitled case on November 16, 1965, rehearing of which was denied on May 11, 1966.

OPINIONS BELOW

The opinion of the United States Court of Appeals for the Fifth Circuit is reported at 352 F. 2d 490. It is set forth in the Appendix, pages 1a through 2a.

The opinion of the United States District Court for the Middle District of Georgia, Macon Division, is not reported, but appears in the record, pp. 121-127.

JURISDICTION

The judgment of the United States Court of Appeals for the Fifth Circuit was rendered on November 16, 1965 (App. 3a). Rehearing was denied on May 11, 1966 (App. 4a). Issuance of the mandate pursuant to the judgment was stayed for a period of thirty (30) days on May 23, 1966, dating from May 11, 1966. The jurisdiction of this Court is invoked pursuant to 28 United States Code, Section 1254(1).

QUESTIONS PRESENTED

1. Where petitioner is arrested by state officers in violation of state law for allegedly operating a motor vehicle on a suspended license upon their bare recollection that petitioner's license had been suspended, did the officers have probable cause to arrest so as to justify a search of petitioner's vehicle for evidence of a violation of federal law under the Fourth and Fourteenth Amendments?

2. Assuming probable cause for the arrest, under the Fourth and Fourteenth Amendments, may evidence obtained in violation of a state statute be used in a federal prosecution?

3. May state officers consistent with the Fourth and Fourteenth Amendments search a motor vehicle contemporaneously with an arrest for a violation of state traffic laws where the exigencies justifying a warrantless search are absent?

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the Fourth and Fourteenth Amendments to the Constitution of the United States.

This case also involves the following Georgia Statutes:

GEORGIA CODE ANNOTATED, SECTION 27-207:

> 27-207 (917 P. C.) Arrest without warrant. An arrest for a crime may be made by an officer, either under a warrant, or without a warrant if the offense is committed in his presence, or the offender is endeavoring to escape, or for other cause there is likely to be a failure of justice for want of an officer to issue a warrant.

GEORGIA CODE ANNOTATED, SECTION 68-1707 (1953):

> 68-1707. Marking of official vehicles.—Any motor vehicle which is used on official business by any person authorized to make arrests for traffic violations in this State, or any municipality or county thereof, shall be distinctly marked on each side and the back with the name of the agency responsible therefor, in letters not less than six inches in height. (Acts 1953, Nov. Sess., pp. 556, 605.)

GEORGIA CODE ANNOTATED, SECTION 68-1701(a) (1953):

> 68-1701. Scope and effect of regulations as to equipment.—(a) It is a misdemeanor for any person to drive or move or for the owner to cause or knowingly permit to be driven or moved on any street or highway any vehicle or combination of vehicles which is in such unsafe condition as to endanger any person, or which does not contain those parts or is not at all times equipped with such lamps and other equipment in proper condition and adjustment as required in sections 68-1701 through 68-1722, or which is equipped in any manner in vio-

lation of said sections, or for any person to do any act forbidden or fail to perform any act required under said sections. . . . (Acts 1953, Nov. Sess., pp. 556, 602).

GEORGIA CODE ANNOTATED, SECTION 92A-422 (1951):

92A-422. Refusal, suspension, revocation, or cancellation of license; hearing.—Upon the refusal, suspension, revocation, or cancellation of any learner's, special learner's, operator's or chauffeur's license for cause, a hearing shall be granted on demand before any agent of the Department of Public Safety authorized by the Director to hear the same, which hearing shall be had in the county of such person's residence, and need not be a matter of record.

. . . (a) Suspension means that the licensee's privilege to drive a motor vehicle is temporarily withdrawn . . . (Acts 1937, pp. 322, 349; 1939, pp. 135, 143; 1943, pp. 196, 201; 1951, pp. 598, 604.)

GEORGIA CODE ANNOTATED, SECTION 92A-423 (1951):

92A-423. Same; appeared to court.—The decision of such agent or officer of the Department of Public Safety shall be final unless the person whose license has been suspended, revoked or cancelled shall desire an appeal, in which case he shall have the right to enter an appeal to the court of the county of his residence, other than a justice's court, having jurisdiction of misdemeanor cases, after notice to the Director, in the same manner as appeals are entered from the court of ordinary, except that he shall not be required to pay the costs in advance. (Acts 1937, pp. 322, 349; 1943, pp. 196, 201; 1951, pp. 598, 605.)

GEORGIA CODE ANNOTATED, SECTION 92A.427.1. Reinstatement of suspended license.—Upon the recommendation of the judge of the court that sus-

pended the operator's or chauffeur's license of any person, the Director of the Department of Public Safety is authorized to reinstate such license. (Acts 1941, pp. 277, 278; 1943, pp. 196, 201; 1951, pp. 598, 606.)

STATEMENT OF THE CASE

WILLIE JACKSON, petitioner, was indicted on February 3, 1964 by the Grand Jury of the United States District Court for the Middle District of Georgia, Macon Division, for alleged violations of 26 United States Code, Sections 5205(a)(2), 5604(a) (R. 1,2). The indictment was in two counts, transportation and possession of non-taxpaid or "moonshine" whiskey.

For several months prior to the events of Sunday, November 3, 1963, plainclothes detectives Jesse Roland and Lonnie R. Brown of the Police Department of the City of Macon, Georgia, who patrolled in an unmarked 1963 Plymouth, had adopted and pursued a policy of stopping, and searching, without a search warrant, any vehicle owned or connected with the petitioner (R. 22, 87-93, 103, 110-112). They pursued this policy because of petitioner's alleged "reputation" as a dealer in "moonshine" whiskey (R. 19). Petitioner, however, had no previous convictions for dealing in "moonshine" whiskey (R. 21).

Roland and Brown were assigned to the vice squad. Seventy-five percent or more of their time was spent making investigations and arrests for moonshine liquor violations (R. 18). They had no connection with the Federal Government and their powers of arrest as officers were derived from the laws of the State of Georgia. They could arrest without a warrant under Section 207, 27 Georgia Code Annotated, for an of-

fense committed in their presence and in two other situations not relied upon to sustain the validity of the arrest and search on Sunday, November 3, 1963.

About seven (7:00) o'clock in the morning, the officers left the police station at City Hall and proceeded on patrol in their unmarked Plymouth (R. 22). Approaching the intersection of Elm and Telfair Streets, they saw the petitioner alone in a red and white two-door Ford traveling in the opposite direction along Telfair Street (R. 28, 30). As petitioner's car came down an incline about a block away, Officer Roland said, "That looks like Stokey (petitioner's nickname) driving that car there" (R. 30). Officer Brown replied, "Sure does" (R. 30). There, they agreed to stop him (R. 31), even though he was not violating any local ordinances (R. 30).

Petitioner turned right off of Telfair Street on to Edgewood Avenue, an unpaved street (R. 31). The tires of his car spun, and a vapor of dust arose (R. 31). The detectives turned and pursued the petitioner with the intention "to catch him for violating the state motor vehicle law" (R. 32). The officers did not know at that time whether petitioner's license had been revoked or suspended (R. 35).

After following petitioner for several blocks, the officers turned on their siren (R. 36) and continued the chase at high speed (R. 41). Detective Roland testified that as the petitioner's car negotiated a curve about two miles from the point at which the chase began, he could "tell the door opened on the right hand side," and "this case went rolling down the street and glass was breaking and liquid running on the street" (R. 44).

Roland and Brown did not stop to determine the nature of the liquid substance (R. 45). They turned sharply in another direction (R. 45, 46) to take advantage of what the trial judge described as "the shorter distance of the hypothenuse as against the two other sides of a triangle" (R. 123). Despite the fact that Brown was puffing away on his cigar, Roland claimed, "there was a smell" (R. 45, 46).

The chase continued for several blocks with the officers "right on [petitioner's] tail" (R. 47). Petitioner's car ran through a driveway into a field and stopped (R. 47, 48). The unmarked Plymouth bumped into the rear of petitioner's car (R. 48). Petitioner got out and moved about ten or fifteen feet from his car (R. 48, 123). Officer Roland got out and bellowed, "Hold it Stokey" (R. 48, 124). Petitioner stopped. The officers placed petitioner in their unmarked Plymouth and then searched his car (R. 48, 65, 66, 114, 124).

Detective Roland, on cross examination, described the search with particularity:

> "Q. And which one of you opened the back of the car, Mr. Brown or you?
>
> A. No, when he got out of the car to abandon it they left a door open and I was the first one up there and you could see a case setting on the back floorboard. Wasn't in the back of the car. It was in the back floorboard.
>
> Q. Was it an open case?
>
> A. The case was closed. I don't know whether it was Atlas or Mason, but one of the two. I recognized it as being a case of half gallon fruit jars.
>
> Q. Half gallon fruit jars?
>
> A. I recognized it being a case, yes sir.

Q. A case in which half gallon fruit jars come?
A. Yes sir.
Q. And what was in it then, you didn't at that moment, have any idea, did you?
A. I knew in my own mind what was in it, yes sir.
Q. You knew in your own mind what was in there?
A. Yes sir.
Q. And then you went on in there and opened it up and verified what was in it, didn't you?
A. Well, we were arresting him for no driver's license" (R. 48, 49).

No effort was made to procure a warrant by car radio during the chase (R. 52). Any of the clerks of court could have issued a warrant, though it was Sunday (R. 53).

Prior to petitioner's arrest, Detectives Roland and Brown had booked "some few" traffic cases (R. 50). Yet, they "were stopping [petitioner] for the driver's license," and "as a result of this arrest, charged him with violating the Alcohol Control [Act]" (R. 55, 107).

A complaint for violation of the Internal Revenue Code was sworn out against petitioner on Monday, November 4, 1963 by William W. Williams of the Alcohol and Tobacco Tax Division of the Internal Revenue Service (R. 3, 4). The sworn complaint was based, in part, upon the factual allegation that certain named state officers had arrested Willie "Stokey" Jackson for driving at a time they "knew that [his] driver's license had been *revoked* . . ." (R. 4, 5).

At the time of the arrest, the detectives did not ask Jackson whether he had a license or not (R. 107, 113).

At the trial, Roland testified from written notes that he was present in Recorder's Court on June 5, 1963 (R. 33, 103), when petitioner's license was allegedly suspended for one year. The Government introduced a certified copy of the conviction and sentence of suspension which showed that the trial before the Recorder was on May 31, 1963 (R. 92; Exh. G-1). The trial judge overruled petitioner's motion to strike the testimony relating to whether or not his license had been suspended on the grounds that the Government had not proved that petitioner's license was still suspended on the date of the arrest. (R. 119).

Petitioner has never been formally charged with violating the state whiskey laws, and the ordinances of the City of Macon respecting "moonshine" whiskey had been declared unconstitutional by the county superior court prior to petitioner's arrest (R. 115). The Government failed to prove whether formal charges were ever brought for the alleged traffic offense (R. 117). A state arrest warrant was not taken out for either the traffic or whiskey charge. Petitioner was held more than forty-eight (48) hours before he was booked. (R. 108, 119).

Prior to trial, petitioner moved to suppress the evidence on the grounds that it was obtained as a result of an illegal search and seizure in violation of his constitutional rights (R. 11-14). The District Judge, after a hearing on April 16, 1964, orally overruled the motion to suppress from the bench (R. 15, 93).

Thereafter, petitioner waived jury trial and agreed for the case to be tried before the Court without a jury (R. 15).

Petitioner entered a plea of not guilty and the case came on for trial before District Judge W. A. Bootle on July 24, 1964.

The District Court held that the search and seizure was valid because it was (1) incident to a lawful arrest, and (2) because of the ambulatory nature of the motor vehicle (R. 126), citing *Rhodes* v. *United States,* 224 F. 2d 348 (5th Cir. 1955) and *Carroll* v. *U. S.* 267 United States 132 (1925). The District Court refused to construe Section 1707, 68, Ga. Code Ann., prohibiting arrests for traffic offenses in unmarked patrol cars, to require exclusion of the evidence seized from petitioner's car (R. 127).

The Court of Appeals held that the search was incident to a valid arrest for a misdemeanor committed in the presence of the seizing officers and that the specific finding of the District Court was, on the record, clearly not erroneous (App. 2a).

Petitioner, on November 24, 1965, filed a motion for rehearing raising the objection that the arrest for the traffic misdemeanor was on bare suspicion and illegal in any event because policemen in unmarked patrol cars are prohibited under penalty of criminal sanction from making arrests for traffic violations. The Court of Appeals held the motion for rehearing for five and a half months and, on May 11, 1966, denied it without comment (App. 4a).

REASONS FOR GRANTING THE WRIT

1. The decision below conflicts with the decisions of this Court requiring a warrantless search of a motor vehicle to be preceded by an arrest based upon probable cause. *Carroll* v. *United States, supra; Scher* v.

United States, 305 U.S. 251 (1938); *Brinegar* v. *United States,* 338 U.S. 160 (1949); *Preston* v. *United States,* 376 U.S. 364 (1964).

The validity of the arrest must be tested by state law. *United States* v. *Di Re,* 332 U.S. 581 (1948). Under state law, the arresting officer must *know* that a crime is actually being committed in his presence. He has no authority upon bare suspicion or upon mere information derived from others to arrest a citizen and search, even for concealed weapons. *Pickett* v. *State,* 99 Ga. 12, 15 (1896).

"Probable cause exists where 'the facts and circumstances within their [the officers'] knowledge and of which they had reasonably trustworthy information [are] sufficient in themselves to warrant a man of reasonable caution in the belief that an offense has been or is being committed." *Brinegar* v. *United States, supra,* at 175, 176; *Carroll* v. *United States, supra,* at 162. Information that the license was suspended was insufficient (in itself) to make out probable cause for the arrest. Corroboration was required; evidence that the license had not been reinstated. By statute, a suspended license may be reinstated (1) by an officer of the Department of Public Safety or (2) upon the recommendation of the judge imposing the sentence of suspension, *supra,* pp. 4, 5. One of the officers testified that he himself had no knowledge of reinstatement proceedings (R. 122). However, since reinstatement proceedings are not matters of record by statute, the officer could have no knowledge of probable cause without inquiring as to whether petitioner possessed his license. Such inquiry was made neither prior to the arrest nor at any time subsequent, *supra,* p. 9.

Facts ascertained after the arrest and search are not relevant. "When the constitutional validity of an arrest is challenged, it is the function of the court to determine whether the facts available to the officers at the moment of the arrest would 'warrant a man of reasonable caution in the belief' that an offense has been committed." *Beck* v. *State of Ohio,* 379 U.S. 89, 96 (1964).

2. The decision of the court below is in direct conflict with the decision of this Court in *Elkins* v. *United States,* 364 U.S. 206 (1960). *Elkins* overturned the so-called "silver platter" doctrine, and held that "evidence obtained by state officers during a search which, if conducted by federal officers, would have violated the defendant's immunity from unreasonable searches and seizures under the Fourth Amendment is inadmissible . . . ." *Elkins* v. *United States, supra,* at 223.[1]

The arresting officers acted *flagrante delicto.* State law specifically prohibits them from arresting for traffic violations in an unmarked car, *supra,* p. 3. They disclaim probable cause to arrest for violation of the state alcohol control law[2] an rely entirely upon the arrest for an alleged traffic violation. "Decency, security and liberty alike demand that Government officials shall be subjected to the same rules of conduct

---

[1] Regardless of whether a warrantless search following an arrest in violation of a state statute constitutes wrongful deprivation of a constitutionally protected right, this Court, as in *Elkins,* may nevertheless exercise its supervisory jurisdiction to review the decision below. But consider *Monroe* v. *Pape,* 365 U.S. 167 (1961).

[2] There was testimony that an informant did relate that petitioner's vehicle was being used to transport whiskey (R. 23). Even if the officers had asserted a claim that the arrest and search was for whiskey, they nevertheless, under *Draper* v. *United States,* 358 U.S. 307 (1959), could not have established probable cause.

that are commands to the citizens," Mr. Justice Brandeis dissenting in *Olmstead* v. *United States*, 277 U.S. 438, at 485 (1928).

The decision below is clearly an "inducement to subterfuge and evasion with respect to federal-state cooperation in criminal investigation" *Elkins* v. *United States, supra,* at 222. The arrest and search are wholly devoid of good faith. The arresting officers have yet to institute formal prosecution in the state courts, *supra,* p. 9. The federal prosecution was inaugurated[3] on November 4, 1963 before the petitioner was even booked, *supra,* p. 8.

3. Certiorari should be granted to resolve the conflict between the logic of *Preston* v. *United States, supra,* and failure of the courts below to follow it on the facts presented. *Preston* held invalid the search of a motor vehicle which was not contemporaneous with the arrest. There, it was said:

> "The rule allowing contemporaneous searches is justified, for example, by the need to seize weapons and other things which might be used to assault an officer or effect an escape, as well as by the need to prevent the destruction of evidence of the crime—things which might easily happen where the weapon or evidence is on the accused's person or under his immediate control. But these justifications are absent where a search is remote in time or place from the arrest. Once an accused is under arrest and in custody, then a search made at another place, without a warrant, is simply not incident to the arrest." 376 U.S., at 367

---

[3] The complaint for violation filed Monday, November 4, 1963, alleged that: "Both [Roland and Brown] knew that Jackson's driver's license had been *revoked* and attempted to stop him" (R. 4). Roland and Brown claimed at the trial that they arrested petitioner for driving on a *suspended* license, a different offense. *Falso in uno, falso in omnibus.*

The search of petitioner's car was not justified.[4] The *status quo* with respect to the vehicle could have been

[4] The justification—necessity rationale authorizing warrantless searches of motor vehicles has had a long and uneven development in the courts. In *Carroll* v. *United States, supra*, prohibition agents having probable cause to believe that an automobile traveling on the highway was carrying liquor stopped it; searched it, and found and seized the liquor. Provisions of the National Prohibition Act, as construed by the Court, authorized such warrantless search of moving vehicles on probable cause, although the Act required a warrant for a building search. The *Carroll* Court found this distinction reasonable, in light of (a) the historical circumstance that the early Congresses, at the time of adoption of the Bill of Rights, had authorized customs searches of vessels on probable cause without warrant, and (b) the practical necessity of law enforcement with respect to vehicles, which may move on and disappear before a warrant can be obtained; and *Carroll* sustained the search. *Carroll* itself thus involves a specific statutory authorization of warrantless search, and can be limited to cases in which a legislature has by particular enactment made a finding of necessity for this sort of search; dictum in *United States* v. *Di Re, supra*, 584-586, strongly supports such a limitation; but the Court in *Brinegar* v. *United States, supra*, without discussing the question, applied *Carroll* to sustain a warrantless automobile search on probable cause in a case where no statute authorized such a search. The argument limiting *Carroll* is compelling, but the lower courts are unlikely to take it seriously unless this Court itself agrees to reconsider *Brinegar*. See, e.g., *Armada* v. *United States*, 319 F.2d 793, 797 (5th Cir. 1963).

Preston is grounded upon *Carroll's* necessity rationale. *Preston* invalidated a warrantless search of an immobilized vehicle, impounded; its driver under arrest. See also *Rent* v. *United States*, 209 F.2d 893 (5th Cir. 1954); *United States* v. *Stoffey*, 279 F.2d 924 (7th Cir. 1960). *Preston* requires reconsideration of previous lower court decisions, some of which it has clearly overruled, e.g., *Sirimarco* v. *United States*, 315 F.2d 699 (10th Cir. 1963). *Preston*, also, compels reconsideration of *United States* v. *Rabinowitz*, 339 U.S. 56 (1950). *Preston* revives *Trupiano* v. *United States*, 334 U.S. 699 (1948), overruled at least in part in *Rabinowitz*. *Trupiano* like *Preston* penalizes, in a different factual contex, the omission to obtain a warrant where a reasonable opportunity to do so existed. Unless *Preston* is extended its effect will be to encourage other warrantless on the scene searches.

maintained until a search warrant was obtained. See *Adams* v. *United States,* 336 F. 2d 752 (D.C. Cir. 1964). The officers had perfected the arrest and had petitioner in custody in their own vehicle before the search occurred, *supra,* p. 7. There was no danger of escape or destruction of the fruits of the crime of operating a motor vehicle on a suspended driver's license. Neither was there any probability of an assault upon the officers. Nor can the search be saved on the grounds that the officers had a custodial duty to seize the vehicle as the instrument of the crime of operating a motor vehicle on a suspended license, for the seizing officers were expressly barred by state law from arresting for traffic infractions while patrolling in an unmarked car, *supra,* p. 3. Thus, to sanction the search is to reward official illegality. *Wong Sun* v. *United States,* 371 U.S. 471 (1963).

CONCLUSION

For the foregoing reasons the petition for writ of certiorari should be granted.

Respectfully submitted,

HOWARD MOORE, JR.
859½ Hunter Street, N.W.
Atlanta, Georgia 30314

JOHN H. RUFFIN, JR.
930 Gwinnett Street
Augusta, Georgia

Attorneys for Petitioner